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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

WASHINGTON TOXICS COALITION,)	
NORTHWEST COALITION FOR)	Civ. No. C01-0132C
ALTERNATIVES TO PESTICIDES,)	
PACIFIC COAST FEDERATION OF)	
FISHERMEN'S ASSOCIATIONS, and)	MOTION FOR RELIEF FROM DEADLINE
INSTITUTE FOR FISHERIES RESOURCES,)	FOR FILING DOCUMENTATION
)	SUPPORTING REPLY IN SUPPORT OF
Plaintiffs,)	PLAINTIFFS' MOTION TO MODIFY JULY
)	2, 2002 ORDER
v.)	
)	NOTE FOR MOTION CALENDAR
ENVIRONMENTAL PROTECTION)	April 6, 2005
AGENCY, and STEPHEN L. JOHNSON,)	
Acting Administrator, ¹)	
)	
Defendants,)	
)	
AMERICAN CROP PROTECTION)	
ASSOCIATION, et al.,)	
)	
Intervenor-Defendants.)	

Plaintiffs Washington Toxics Coalition et al. ("Toxics Coalition") hereby seek leave to

¹ Please note that pursuant to Fed. R. Civ. P. 25(d)(1), Stephen L. Johnson, Acting Administrator, is substituted as a defendant for Michael O. Leavitt, Administrator.

MOTION FOR RELIEF FROM DEADLINE FOR
FILING DOCUMENTATION SUPPORTING REPLY
IN SUPPORT OF PLAINTIFFS' MOTION TO
MODIFY JULY 2, 2002 ORDER (C01-0132C) - 1 -

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1 file a declaration from Erika Schreder submitting further supporting documentation for their
2 motion to modify the July 2, 2002 Order, which was noted for March 25, 2005. The Toxics
3 Coalition requests leave to file this documentation two working days after the deadline for their
4 reply brief because the declarant provided the supporting documents to counsel after the close of
5 business on Thursday, March 24, 2005, the day the reply brief was due and the declarant was not
6 in the office on Friday, March 25, 2005. Accordingly, this is the first business day on which the
7 Toxics Coalition could submit the supporting documentation to the Court. No party will be
8 prejudiced by this delayed filing since the documents support plaintiffs' reply brief and no other
9 party has the right to submit additional briefing on this motion.

10 Respectfully submitted this 28th day of March, 2005.

11
12
13 /s/ Patti Goldman
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CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the State of Washington. I am over 18 years of age and not a party to this action. My business address is 705 Second Avenue, Suite 203, Seattle, Washington 98104.

On March 28, 2005, I served a true and correct copy of:

1. MOTION FOR RELIEF FROM DEADLINE FOR FILING DOCUMENTATION SUPPORTING REPLY IN SUPPORT OF PLAINTIFFS' MOTION TO MODIFY JULY 2, 2002 ORDER
2. SECOND DECLARATION OF ERIKA SCHREDER
3. [PROPOSED] ORDER

on the parties listed below:

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U.S. Department of Justice
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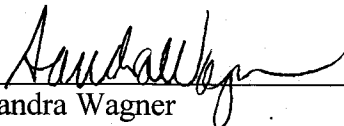
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14 I, Sandra Wagner, declare under penalty of perjury that the foregoing is true and correct.

15 Executed this 28nd day of March, 2005, at Seattle, Washington.

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Sandra Wagner